

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
:
BAYSHORE CAPITAL ADVISORS, LLC, BCA :
ALTERNATIVE INCOME FUND, LP, and :
ROCKING T RANCH, LLLP, :

Plaintiffs, :

v. :

CREATIVE WEALTH MEDIA FINANCE CORP., :
BRON CREATIVE CORP., BRON CREATIVE :
USA CORP., BRON STUDIOS, INC., BRON :
STUDIOS USA, INC., HUDSON VALLEY :
WEALTH MANAGEMENT, INC., JASON :
CLOTH, AARON L. GILBERT, CHRISTOPHER :
CONOVER, DAVID K. JONAS, and DOES 1-21, :

Defendants. :
----- X

Case No: 7:22-cv-1105-KMK

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the declaration of William R. Fried, Esq., dated August 26, 2022, and the exhibit annexed thereto, the declaration of Jason Cloth, sworn to on August 25, 2022, and the exhibits annexed thereto, and the accompanying memorandum of law, Defendants Creative Wealth Media Finance Corp., Bron Creative Corp., Bron Creative USA, Corp., and Jason Cloth (collectively, the “Creative Defendants”), by their attorneys Herrick, Feinstein, LLP, will respectfully move before the Honorable Kenneth M. Karas at the United States Courthouse for the Southern District of New York, located at 300 Quarropas Street, Courtroom 521, White Plains, NY 10601, on a date and a time to be determined by the Court, with opposition and reply papers to be filed in accordance with the Court’s Scheduling Order and Minute Entry dated July 15, 2021 (Doc. No. 66), for an Order dismissing the First Amended Complaint against the Creative Defendants with prejudice, (i) for lack of personal jurisdiction pursuant to FRCP

12(b)(2) and, in the alternative, based upon *forum non conveniens*; and (ii) for failure to state a claim pursuant to FRCP 12(b)(6).

Dated: August 26, 2022
New York, New York

HERRICK, FEINSTEIN LLP

By: /s/ William R. Fried

William R. Fried, Esq.

Samuel J. Bazian, Esq.

Daniel A. Field, Esq.

2 Park Avenue

New York, New York 10016

(212) 592-1400

*Attorneys for Defendants Creative Wealth
Media Finance Corp., Bron Creative Corp.,
Bron Creative USA, Corp., and Jason Cloth*